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HITACHI ELECTRONIC DEVICES (USA), INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

This Document Relates To:

All Actions.

DECLARATION OF L. THOMAS HEISER
IN SUPPORT OF HITACHI ELECTRONIC
DEVICES (USA), INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON
DUE PROCESS GROUNDS

1 I, L. Thomas Heiser, hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action. I have personal
3 knowledge of the facts and matters stated herein and, if called, could and would testify competently
4 to them.

5 2. I am President and Chief Executive Officer of Hitachi Electronic Devices (USA), Inc.
6 ("HEDUS"). I have been employed by HEDUS since 1998 and have held a variety of positions
7 within HEDUS, including many in sales and management. Prior to my current position, I served as
8 Senior Vice President and General Manager of Sales of HEDUS. I have also served on HEDUS's
9 Board of Directors since April 2008. During my tenure at HEDUS, I have held various management
10 positions in which I had direct management responsibility for product development, sales,
11 engineering, and manufacturing. As a result of my long tenure with HEDUS and the various
12 positions I have held within the organization, I am familiar with HEDUS's historical business,
13 including sales and manufacturing and, in particular, its involvement in the color display tubes
14 ("CDT tubes") and color picture tube ("CPT tubes") (jointly, "CRT") business. In my capacity as
15 President and Chief Executive Officer of HEDUS, as well as my service on the Board of Directors of
16 HEDUS, I am familiar with HEDUS's business generally and, in particular, its involvement in the
17 CRT industry. I am authorized to make this declaration on behalf of HEDUS. I am informed and
18 believe that the matters stated in this declaration are true.

19 3. HEDUS is a Delaware corporation with its principal place of business at 208
20 Fairforest Way, Greenville, South Carolina, 29607.

21 4. Prior to April 2002, HEDUS manufactured cathode ray tubes ("CRTs"). HEDUS
22 sold CRTs to CRT Product manufacturing facilities located inside and outside of the United States.
23 HEDUS did not sell CRTs to consumers because CRTs are not a standalone product. During the
24 Relevant Period, HEDUS did not sell or manufacture CRT Products in the United States.

25 5. HEDUS does not own property in Arizona, California, Florida, Illinois,
26 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New York, New Mexico,
27 North Carolina, or Wisconsin. HEDUS has not acquired or leased property in Arizona, Florida,
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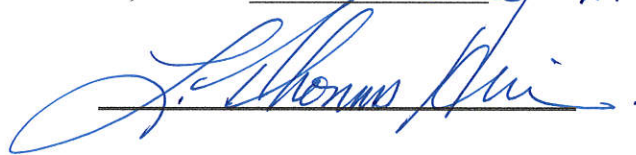
1 Illinois, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, New York, New Mexico,
2 North Carolina, or Wisconsin.

3 6. Based on the information reasonably available to HEDUS today, no officer or
4 director of HEDUS resides in Arizona, Florida, Illinois, Massachusetts, Michigan, Minnesota,
5 Mississippi, Nebraska, Nevada, New York, New Mexico, North Carolina, or Wisconsin or did so
6 during the Relevant Period.

7 7. HEDUS has never filed or been required to file taxes in Arizona, Florida, Illinois,
8 Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, New York, New Mexico, North
9 Carolina, or Wisconsin.

10 8. HEDUS has never held any formal meetings of its directors in the Arizona,
11 California, Florida, Illinois, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada,
12 New Mexico, North Carolina, or Wisconsin.

13 I declare under penalty of perjury under the laws of California that the foregoing is true and
14 correct. Executed on the 6TH day of November, 2014 in LAWRENCEVILLE, GA

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